

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

INTERFAITH COMMUNITY
ORGANIZATION, et al.,

Plaintiffs,

vs.

HONEYWELL INTERNATIONAL INC.,
et al.,

Defendants.

Civil Action No. 95-2097 (DMC)

REPLY DECLARATION OF BRUCE M. SASS

I, BRUCE M. SASS, under penalty of perjury, declare as follows:

1. I have extensive experience and education in the fields of geochemistry, mineralogy and environmental science and I am a Senior Research Scientist with Battelle Memorial Institute (“Battelle”) located at 505 King Avenue, Columbus, Ohio 43201.

2. In connection with Honeywell International Inc.’s (“Honeywell”) Motion to Modify the Full Excavation Component of the Final Judgment, I prepared and executed on October 6, 2005 a declaration providing my professional opinions with respect to a number of issues relating to the geochemical mechanism of COPR heave and expansion.

3. In describing my familiarity with the Site and my history of continuing involvement in COPR heave research for Honeywell, I stated in paragraph 15 of my prior declaration that “in or about June 2003, I was asked by Honeywell, through Parsons, if I would

serve with other outside scientists and engineers" on a newly formed COPR heave research team. I also stated in the same paragraph that: "In June 2004, Honeywell contracted for Battelle's services and my assignment as part of the team focused on gaining a complete understanding as to the geochemical mechanism of COPR heave and expansion."

4. I have been advised by Honeywell's counsel that plaintiffs question paragraph 15 of my prior declaration as being ambiguous as to whether I resumed my research for Honeywell with respect to the geochemical mechanism of COPR heave and expansion in June 2003 or June 2004.

5. My research work for Honeywell with respect to the geochemical mechanism of COPR heave and expansion resumed in June 2003 as part of the newly chartered COPR heave research team that included Dr. Rudy Bonaparte and others. Battelle paid for my services for the period June 2003 to June 2004 under a subcontract with Parsons, Honeywell's lead consultant. In June 2004, Battelle contracted directly with Honeywell for my services.

I certify under penalty that the foregoing is true and accurate. Executed this 29th day of November 2005.


BRUCE M. SASS

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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_____	:	Civil Action No. 95-2097 (DMC)
INTERFAITH COMMUNITY	:	
	:	
ORGANIZATION, et al.,	:	
	:	
Plaintiffs,	:	
	:	
-vs-	:	
	:	
HONEYWELL INTERNATIONAL INC.,	:	
	:	
et al.,	:	
	:	
Defendants.	:	
_____	:	

CERTIFICATION OF FACSIMILE SIGNATURE

MELISSA E. FLAX, of full age, does hereby certify as follows:

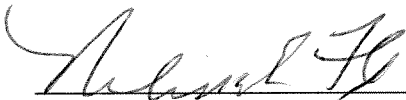
1. I am an attorney at law of the State of New Jersey and a member of the firm of Carella, Byrne, Bain, Gilfillan, Cecchi, Stewart & Olstein, co-counsel for defendant Honeywell International Inc. ("Honeywell").

2. In connection with Honeywell's reply papers in further support of its motion to modify the full excavation component of the Final Judgment, the Reply Declaration of Bruce M. Sass has been filed with the Court. The Declaration bears a facsimile signature.

3. Dr. Sass has acknowledged to me the genuineness of his signature appearing on his declaration.

4. A copy of the Declaration with an original signature affixed will be filed if requested by the Court or a party.

I certify under penalty of perjury that the foregoing is true and correct. Executed on November 29, 2005.


MELISSA E. FLAX [MEF 4060]